

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**Case No.: 22-CV-22538-ALTMAN/REID**

Pierce Robertson, et al., on behalf of themselves  
and all others similarly situated,

Plaintiffs,

**CLASS ACTION COMPLAINT**

v.

**JURY DEMAND**

Mark Cuban, Dallas Basketball Limited, d/b/a  
Dallas Mavericks, and Stephen Ehrlich,

Defendants.

/

**NOTICE OF VOLUNTARY DISMISSAL OF DEFENDANT STEPHEN EHRLICH  
WITH PREJUDICE SUBJECT TO RESERVATION OF RIGHTS**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and further in accordance with the Stipulation and Agreed Order Resolving Adversary Proceeding No: 22-01138, filed in the Court record at ECF No. 18-1, Plaintiffs hereby file this notice of voluntary dismissal of Defendant Stephen Ehrlich with prejudice, subject to the Reservation of Rights as set forth in Paragraph 2 of the Stipulation and Agreed Order. Pursuant to the Stipulation and Agreed Order, Plaintiffs, the Voyager Debtors, and Defendant Ehrlich shall bear their own costs and attorneys' fees.

Dated: October 21<sup>st</sup>, 2022.

Respectfully submitted,

**By: /s/ Adam M. Moskowitz**

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*Case No.: 22-CV-22538-ALTMAN/REID*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the forgoing was filed on October 21, 2022, with the Court via CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam M. Moskowitz  
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